

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

Sean Frederick McCoshen,

Debtor in a Foreign Proceeding.

Case No. 21-31733-tmb15

Chapter 15

**NOTICE OF CHAPTER 15 PETITION  
AND RECOGNITION HEARING**

**PLEASE TAKE NOTICE** that on August 11, 2021, A. Farber & Partners Ltd., in its capacity as the trustee (the “Trustee”) appointed in the Canadian insolvency proceeding of Sean Frederick McCoshen (the “Debtor”), *In the Matter of the Bankruptcy of: Sean Frederick McCoshen*, District of Alberta, Division No. 01-Edmonton, Court No. 24-2746643, Estate No. 24-2746643 (the “Canadian Proceeding”), and as authorized foreign representative of the Debtor, filed the Official Form 401 *Chapter 15 Petition for Recognition of a Foreign Proceeding* (ECF No. 1) and *Verified Petition for Recognition of Foreign Main Proceeding and Related Relief* (ECF No. 3) (together, the “Petition”) with the United States Bankruptcy Court for the District of Oregon (the “Bankruptcy Court”) under Chapter 15 of Title 11 of the United States Code (the “Bankruptcy Code”) seeking recognition of the Canadian Proceeding as a foreign main proceeding and related relief.

**PLEASE TAKE FURTHER NOTICE** that a hearing has been scheduled on September 8, 2021, at 10:00 a.m. (prevailing Pacific Time), by video, to consider the Petition (the “Recognition Hearing”). Visit <https://www.orb.uscourts.gov/video-hearings> for connection information.

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Petition must be made in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Oregon, in writing describing the basis therefor, filed with the Office of the Clerk of the Court, 1050 SW 6th Avenue #700, Portland, Oregon 97204 not later than September 1, 2021 and served upon the following: (A) U.S. counsel for the Trustee, Lane Powell PC, 601 S.W. Second

Avenue, Suite 2100, Portland, Oregon 97204, Attention: David W. Criswell (criswelld@lanepowell.com); Andrew J. Geppert (gepperta@lanepowell.com); and James B. Zack (zackj@lanepowell.com); (B) Canadian counsel for the Trustee, MLT Aikins LLP, 2100 Livingston Place, 222 Third Avenue SW, Calgary, Alberta T2P 0B4, Canada, Attention: Ryan Zahara (rzahara@mltaikins.com); and (C) the Trustee, A. Farber & Partners Ltd., 150 York Street, Suite 1600, Toronto, Ontario, M5H 3S5 Canada, Attention: John Hendriks (jhendriks@farbergroup.com).

**PLEASE TAKE FURTHER NOTICE** that if no response is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested in the Petition without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court at such hearings of the adjourned date or dates or any adjourned hearing.

**PLEASE TAKE FURTHER NOTICE** that no time period or place for the filing of proofs of claim has been established and creditors need not file proofs of claim at this time.

**PLEASE TAKE FURTHER NOTICE** that copies of the Petition and other filings in this case are presently available (1) via Public Access to Court Electronic Records (PACER), which can be accessed from the Bankruptcy Court's website at <https://ecf.ord.uscourts.gov/> (a PACER login and a password are required to retrieve a document), and/or (2) upon written request to the Trustee's counsel addressed to:

Lane Powell PC  
Attn: David W. Criswell  
601 S.W. Second Avenue, Suite 2100,  
Portland, Oregon 97204

DATED: August 18th, 2021

LANE POWELL PC

By: /s/David W. Criswell

David W. Criswell, OSB No. 925930

Andrew J. Geppert, OSB No. 203744

James B. Zack, *pro hac vice*

Telephone: 503.778.2100

Facsimile: 503.778.2200

Attorneys for A. Farber & Partners Ltd.,  
Foreign Representative

**CERTIFICATE OF SERVICE**

I, Andrew J. Geppert, hereby certify that on this 18th day of August, 2021, I caused a copy of the **NOTICE OF CHAPTER 15 PETITION AND RECOGNITION HEARING; CHAPTER 15 PETITION FOR RECOGNITION OF A FOREIGN PROCEEDING; VERIFIED PETITION FOR RECOGNITION OF FOREIGN MAIN PROCEEDING AND RELATED RELIEF; and ORDER GRANTING PROVISIONAL RELIEF** to be served via electronic mail (as applicable) and by regular mail and on the following:

Oregon Department of Revenue  
Attn: ODR Bkey  
955 Center NE #353  
Salem, OR 97301-2555

IRS  
PO Box 7346  
Philadelphia PA 19101-7346

Daniel K. Jukes  
Miles Davison LLP  
900, 517 – 10th Avenue S.W.  
Calgary, Alberta T2R 0A8  
Canada  
djukes@milesdavison.com  
*Counsel for the Debtor*

Matthew Tercek  
Cascade Sothebys International Realty  
310 N. State Street, Suite 102  
Lake Oswego, OR 97034  
matthew@tercekre.com

Dunn Carney LLP  
851 SW Sixth Avenue  
Suite 1500  
Portland, OR 97204  
JChambers@dunncarney.com

Meagan Binder  
Bridging Finance Inc. c/o  
PricewaterhouseCoopers Inc.  
18 York Street, Suite 2600  
Toronto ON M5J 0B2  
Canada  
binder.t.meagan@pwc.com

Meagan Binder  
Bridging Income Fund LP c/o  
PricewaterhouseCoopers Inc.  
18 York Street, Suite 2600  
Toronto ON M5J 0B2  
Canada  
binder.t.meagan@pwc.com

Meagan Binder  
Sprott Bridging Income Fund LP  
c/o PricewaterhouseCoopers Inc.  
18 York Street, Suite 2600  
Toronto ON M5J 0B2  
Canada  
binder.t.meagan@pwc.com

Peter Martin  
CIBC Bank USA  
120 S. LaSalle  
Chicago IL 60603  
Peter.Martin@cibc.com

John F. Grieve  
National Bank of Canada  
c/o Fasken  
550 Burrard Street, Suite 2900  
Vancouver British Columbia  
V6C 0A3  
Canada  
jgrieve@fasken.com  
audrey.ng@nbc.ca

Laura Agnew  
Laura Agnew Designs  
4711 Woodside Place West  
Vancouver BC V7S 2X5  
Canada  
daxtonlee@me.com

Donald Seymour  
GRO Design Center  
GRO Outdoor Living  
PO Box 821569  
Vancouver, WA 98682  
info@grooutdoorliving.com

Stoneridge Custom Development LLC  
16805 Gassner Ln  
Suite B  
Lake Oswego, OR 97035  
matthew@luxecir.com

Office of The United States Trustee  
Region 18: District of Oregon (Portland  
Division)  
Attn: Christian Torimino  
Christian.Torimino@usdoj.gov

/s/ Andrew J. Geppert  
Andrew J. Geppert